

REMARKS

In the Final Office Action¹, the Examiner rejected claims 1-5 and 7-10 under 35 U.S.C. 103(a) as being unpatentable over Cuervo et al. (Network Working group, RFC 3015, Megaco protocol Version 1.0 November 2000, "*Cuervo*") in view of Matsuzaki et al. (USPN 6058476, "*Matsuzaki*").

By this Amendment, Applicant has amended claims 1, 7 and 9, and has cancelled claims 4, 8, and 10. Reconsideration of the rejections and timely allowance of the pending claims 1-3, 5, 7, and 9 in light of the foregoing amendments and the following comments is respectfully requested.

Rejection of Claims 1-5 and 7-10 Under 35 U.S.C. § 103(a)

Claims 4, 8, and 10 are cancelled, rendering their rejection moot. Applicant respectfully traverses the rejection of claims 1-3, 5, 7, and 9 under 35 U.S.C. § 103(a) as being unpatentable over *Cuervo* in view of *Matsuzaki*. A *prima facie* case of obviousness has not been established.

Independent claim 1 recites, in part:

wherein sending by the MGC a security authentication request comprises:

sending, by the MGC, a Request Notification command or a Modify command to the MG, and,

allocating a Request Identifier to request the MG to detect a security authentication completion event, and

¹ The Final Office Action may contain a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicant declines to automatically subscribe to any statement or characterization in the Final Office Action.

wherein reporting the calculation result to the MGC by the MG comprises:

generating, by the MG, the security authentication completion event,
checking, by the MG, whether the MGC has requested to report the security authentication completion event,
if the MGC has requested to report the event, sending, by the MG, to the MGC a Notify command with the detected event being the security authentication completion event and the parameter of the event being the encrypted result, a Request identifier of the Notify command being identical to the Request identifier allocated by the MGC.

Cuervo and *Matsuzaki*, whether taken alone or in combination, do not teach or suggest at least these elements.

Cuervo is directed to “the protocol used between elements of a physically decomposed multimedia gateway, i.e. a Media Gateway and a Media Gateway Controller.” *Cuervo*, Abstract. The Office asserted that sections 7 and 10 of *Cuervo* contains teachings of various elements of claim 1 before being amended by this Amendment. See Final Office Action, pp. 4-6. Without acquiescing to this assertion, Applicant notes that section 7 of *Cuervo* at best may describe various commands, such as Add, Move, and Modify. Section 10 of *Cuervo* at best may cover security when using the protocol in an IP environment. However, there is no teaching or suggestion in *Cuervo* of the above-quoted elements recited in claim 1.

Furthermore, *Matsuzaki* does not help bridge the gap between claim 1 and *Cuervo*. The Office asserted that *Matsuzaki* teaches certain elements of claim 1. See Final

Office Action, p. 6. Without acquiescing to this assertion, Applicant notes that *Matsuzaki* is directed to “an encryption apparatus for ensuring securing in communication between devices.” *Matsuzaki*, title. The primary object of *Matsuzaki* is “to provide an encryption device processing the minimum functions necessary for ensuring the security of communication between devices using only a small encryption IC.” *Matsuzaki*, col. 5, ll. 29-32. The main solution of *Matsuzaki* is using an encryption apparatus for devices which distribute a data transfer key and use the data transfer key to perform encrypted communication. See, e.g., *Matsuzaki*, col. 5, ll. 45-67. However, there is still no teaching or suggestion of the above-quoted elements recited in claim 1.

For at least the foregoing reasons, the combination of *Cuervo* and *Matsuzaki* does not disclose all the elements of claim 1. Thus, Applicant respectfully requests withdrawal of the rejection of independent claim 1, as well as dependent claims 2, 3, and 5, as “dependent claims are nonobvious if the independent claims from which they depend are nonobvious.” *In re Fritch*, 972 F.2d 1260, 1266 (Fed. Cir. 1992).

As claims 7 and 9 are independent claims reciting elements similar to claim 1, they are allowable for reasons similar to those discussed above in regard to the rejection of claim 1. Therefore, Applicant respectfully requests withdrawal of the rejection of independent claims 7 and 9.

CONCLUSION

In view of the foregoing amendments and remarks, Applicant respectfully requests reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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